

## **EDA Construction Application Requirements For Build Back Better Regional Challenge (BBBRC) Phase 2 Applicants**

Section D.b.ii of the BBBRC Notice of Funding Opportunity (NOFO) sets out the application requirements for a construction component project. This document sets out additional hints and tips for completing two key elements of a construction application: the **environmental narrative** and the **Form ED-900C, including the preliminary engineering report (PER)**.

The **environmental narrative** you must complete provides EDA's environmental officers with the information they need to complete their **National Environmental Policy Act (NEPA)** review of your project.

### Hints:

- Start working on your Environmental Narrative early to identify potential areas of concern.
- Answer every question in the narrative. “*Not Applicable*” is not a sufficient response to any given question. , If something does not apply apply to a project, you must tell us why. Be thorough but concise.
- In section 4 “Alternatives to Proposed Project” describe at least three options that were considered in the development of the project: 1) the preferred option (your project); 2) at least one alternative that was considered but discarded and why, and 3) the “no-action” alternative (if you did nothing) and why taking no-action is not ideal. Of course, if additional alternatives were considered, you may include them.
- Include maps and photos of the project site.
- Special Studies that may be required: – Your BBBRC Phase 1 award can fund these if needed:
  - Phase I and/or Phase II Environmental Assessments (these may be required in specific circumstances – for example, if there is potential contamination in connection with the project);
  - Cultural resource surveys; and
  - Biological assessments (Threatened & Endangered Species).

Section C.5 “Endangered Species.” A list of relevant species and potential for direct or indirect impacts is required – please engage a professional biologist with relevant experience.

Consultations with relevant resource agencies may be required depending on the biologist's determination, so start early, if possible:

- Consultations with the US Fish & Wildlife Service (USFWS) and/or National Marine Fisheries Service (NMFS).
  - If the applicant determines that no relevant species or there are no impacts, a **consultation may not be required**.
  - If the project “may affect, not likely to adversely affect” a listed species or critical habitat then the applicant can start a consultation with USFWS and/or NMFS.
  - If the project “may affect, likely to adversely affect” a listed species or critical habitat, EDA must lead this consultation.
- Section 106 consultations under the National Historic Preservation Act (NHPA) with the relevant State or Tribal Historic Preservation Officer (SHPO or THPO). The

following website can be useful for identifying THPOs (<https://egis.hud.gov/TDAT/>). **This consultation is almost always required.** Reference EDA as the Federal Agency with which you're working . The SHPO and/or THPO may request a delegation of authority memo; your Economic Development Representative (EDR) can provide you with one.

The **ED900C and Preliminary Engineering Report (PER)** contain basic questions about the construction and legal aspects of the construction project. We want to know about all relevant aspects of the project, including property ownership, required rights of way, any existing liens, required permits, and potential future uses of the property. . Ask your EDR if you are unsure how to answer something.

For the **PER** the applicant needs to provide a separate document that explains:

- project components i.e., new infrastructure or facilities, renovation, replacement. describe in terms of dimensions, quantities, capacities, square footage etc.
- drawings of general layout and location – include all components and beneficiaries,
- a feasibility analysis of the constructability of the project,
- construction cost estimate broken down by **quantities** and **unit prices** and an overall budget breakdown (see SF424C or categories),
- timeline for completion - include design, permitting, bidding, and construction
- the method of construction to be used i.e., competitive bid, design/build etc., and
- the number of contracts the applicant plans on executing.

Have a question? Ask your EDR (listed at [www.eda.gov/contact/](http://www.eda.gov/contact/)). If they don't know the answer, they will consult with an EDA subject matter expert (SME).